

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

THE UNITED STATES for the use of)
 GMW Fire Protection, Inc., an Alaska)
 Corporation,)

Plaintiff,)

vs.)

KANAG'IQ CONSTRUCTION CO.,)
 INC., an Alaska Corporation, and)
 WESTERN SURETY COMPANY, a)
 South Dakota Corporation,)

Defendants.)

Case No. A05-170 CI (TMB)

MOTION FOR STAY OF EXECUTION OF JUDGMENT

Pursuant to Federal Civil Rule 62(b), Defendants, KANAG'IQ CONSTRUCTION CO., INC. and WESTERN SURETY COMPANY, by and through their attorneys, Eide & Gingras, P.C., request that the Court stay any execution of judgment until the resolution of pending motion practice before the Court that may affect the judgment.

On February 8, 2008, Defendants filed a Motion for Judgment Notwithstanding the Verdict or, in the Alternative, Motion for a New Trial. The Court's decision on that motion may affect the judgment against Western Surety and/or Kanag'Iq. Absent an order from the Court granting a stay of execution of the judgment until the pending motion is ruled upon, Plaintiff may otherwise proceed to execute against the judgment as of today, February 11, 2008.

Eide & Gingras, P.C.
 425 G Street, Suite 930
 Anchorage, Alaska 99501
 (907) 279-0930 telephone
 (907) 279-0933 fax

1 Therefore, Defendants respectfully request the Court to stay any execution of
2 judgment until the Court rules upon the pending motion before it, which may affect the
3 judgment. Because of the time constraint described above, Defendants further request a
4 decision by the close of business today, or as soon thereafter as possible.

5 DATED at Anchorage, Alaska this 11th day of February 2008.

6 EIDE & GINGRAS, P.C.
7 Attorneys for Defendants
8 Kanag'Iq Construction Co., Inc. and
9 Western Surety Company

10 By: s/Thomas S. Gingras
11 Thomas S. Gingras
12 425 G Street, Suite 930
13 Anchorage, AK 99501
14 Phone: (907) 279-0930
15 Fax: (907) 279-0933
16 E-mail: tsgingras@egpalaska.com
17 Alaska Bar No. 7811098

18 **CERTIFICATE OF SERVICE**

19 I am a legal secretary employed by the law
20 firm of Eide & Gingras, P.C. That on this
21 11th day of February 2008, I served

22 [x] Electronically

23 a true and accurate copy of the foregoing
24 document upon the following counsel of record:

25 Sarah J. Tugman, Esq.
2509 Eide Street, Suite 4
Anchorage, AK 99503

EIDE & GINGRAS, P.C.

By /s/Donna Charter

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